

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

HP INC., a Delaware corporation; and
**HEWLETT-PACKARD DEVELOPMENT
COMPANY, L.P.**, a Texas limited
partnership,

Plaintiffs,

v.

ZTHY TECH INC., a California corporation;
batterymon16, an entity of unknown form;
ehome007, an entity of unknown form;
elecbrain15, an entity of unknown form;
Idallian, an entity of unknown form; **irelia_jt**,
an entity of unknown form; **lol-electronic**, an
entity of unknown form; **shop-siker**, an entity
of unknown form; **shunwei2014**, an entity of
unknown form; **sunflower-electronic**, an
entity of unknown form; **suntek-wireless**, an
entity of unknown form; **yolanda_dh1**, an
entity of unknown form; and **DOES 1
through 20**,

Defendants.

Case No. 1:19-cv-07210-RPK-RER

**STIPULATION FOR ORDER
EXTENDING PRELIMINARY
INJUNCTION**

Judge: Honorable Rachel P. Kovner

STIPULATION

Plaintiffs HP, INC. and HEWLETT-PACKARD DEVELOPMENT COMPANY, L.P. along with Defendants ZTHY TECH, INC. and batterymon16 (these two defendants shall be referred to herein as “Defendants;” and collectively, Plaintiffs and these Defendants shall be referred to as the “Parties Concerned”) hereby stipulate and agree to this request for an expansion of the effective period for a preliminary injunction, previously entered by this Court, so that it will remain in effect for the pendency of this matter.

On March 20, 2020, this Court entered a preliminary injunction (ECF Document #33 [“Doc. 33”]) that was subsequently amended on March 26, 2020 (Doc. 38), and which affects only the Parties Concerned (“Preliminary Injunction”). The Court also allowed that Defendants

could oppose the Preliminary Injunction from being extended to run for a longer period of time, and it set a briefing and hearing schedule to allow the Parties Concerned an opportunity to be heard on that issue. *Id.* Defendants do not contest that the Preliminary Injunction should remain in effect for the duration of this litigation.

The Parties Concerned hereby agree and request that the Court issue an order that expands the effective date of the Preliminary Injunction so that it remains in effect for the pendency of this action. A modified preliminary injunction acceptable to the Parties Concerned is attached hereto as “Exhibit A.” The Parties Concerned also request that the hearing on this matter, presently set for April 23, 2020 at 11:00 a.m. EDT, be taken off calendar.

IT IS SO STIPULATED AND AGREED:

Dated: April 16, 2020

/s/ Louis P. Feuchtbaum

Louis P. Feuchtbaum
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Counsel for Plaintiffs HP Inc. and Hewlett-Packard Development Company, L.P.

Dated: April 16, 2020

/s/ Timothy T. Wang

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Attorney for Defendants Zthy Tech, Inc. and batterymon16

DECLARATION OF CONSENT OBTAINED FROM SIGNATORIES

I, Louis P. Feuchtbaum, hereby attest and declare subject to penalty of perjury under the laws of the United States, that Timothy T. Wang, counsel for Defendants Zthy Tech, Inc. and batterymon16, agreed to this stipulation and authorized me to indicate his assent by affixing his electronic signature to this document.

Dated: April 16, 2020

/s/ Louis P. Feuchtbaum

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